

ORIGINAL

FILED IN OPEN COURT
U.S.D.C. - Atlanta

SEP 15 2020

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JAMES N. HATTEN, Clerk
Deputy Clerk

UNITED STATES OF AMERICA

v.

NICHOLAS JOSEPH TINDALL

Criminal Action No.

1 20 - CR - 3 5 7

UNDER SEAL

Motion to Seal Indictment

The United States of America, by Byung J. Pak, United States Attorney, and Ryan K. Buchanan, Assistant United States Attorney for the Northern District of Georgia, respectfully requests that the attached **Indictment**, motion to seal and order be sealed for the following reasons:

Since the investigation is continuing, the disclosure of the Indictment at this time would seriously jeopardize the ongoing investigation, as such disclosure may jeopardize the safety of law enforcement members attempting to arrest the defendant, prompt the defendant to destroy evidence, change patterns of behavior, notify confederates, or allow the defendant and confederates to flee or continue flight from prosecution.

WHEREFORE, the United States of America respectfully requests that this motion, the **Indictment** and ensuing order be sealed.

Submitted this 15th day of September 2020.

Respectfully submitted,

BYUNG J. PAK
United States Attorney

A handwritten signature in blue ink, appearing to read 'R. Buchanan', is written over the printed name of Ryan K. Buchanan.

/s/ Ryan K. Buchanan
Assistant United States Attorney
Georgia Bar No. 623388
Ryan.Buchanan@usdoj.gov